



8. Denied. ADAPTIX is a Delaware corporation with its principal place of business in the Eastern District of Texas at 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.

**COUNTERCLAIM COUNT I**  
**(Non-infringement of U.S. Patent No. 7,146,172)**

9. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.

10. Denied.

11. Denied.

**COUNTERCLAIM COUNT II**  
**(Invalidity of U.S. Patent No. 7,146,172)**

12. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.

13. Denied.

14. Denied.

**COUNTERCLAIM COUNT III**  
**(Non-infringement of U.S. Patent No. 6,870,808)**

15. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.

16. Denied.

17. Denied.

**COUNTERCLAIM COUNT IV**  
**(Invalidity of U.S. Patent No. 6,870,808)**

18. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.

19. Denied.

20. Denied.

**COUNTERCLAIM COUNT V**  
**(Non-infringement of U.S. Patent No. 7,573,851)**

21. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.
22. Denied.
23. Denied.

**COUNTERCLAIM COUNT VI**  
**(Invalidity of U.S. Patent No. 7,573,851)**

24. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.
25. Denied.
26. Denied.

**COUNTERCLAIM COUNT VII**  
**(Non-infringement of U.S. Patent No. 6,904,283)**

27. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.
28. Denied.
29. Denied.

**COUNTERCLAIM COUNT VIII**  
**(Invalidity of U.S. Patent No. 6,904,283)**

30. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.
31. Denied.
32. Denied.

**COUNTERCLAIM COUNT IX**  
**(Non-infringement of U.S. Patent No. 7,072,315)**

33. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.

34. Denied.

35. Denied.

**COUNTERCLAIM COUNT X**  
**(Invalidity of U.S. Patent No. 7,072,315)**

36. ADAPTIX repeats and re-alleges the allegations contained in paragraphs 1-8 above as if fully set forth herein.

37. Denied.

38. Denied.

**AFFIRMATIVE DEFENSES**

1. Defendant's counterclaims fail to state a claim upon which relief may be granted.
2. Defendant has unclean hands due to its infringement of the patents-in-suit.

**DEMAND FOR JURY TRIAL**

ADAPTIX demands trial by jury on all issues set forth in Defendant's First Amended Answer, Affirmative Defenses, and Counterclaims so triable.

**PRAYER FOR RELIEF**

WHEREFORE, ADAPTIX respectfully requests that this Court:

- a. Enter judgment in favor of ADAPTIX on all issues set forth in Defendant's First Amended Answer, Defenses and Counterclaims;
- b. Deny all relief requested by Defendant in Defendant's First Amended Answer, Defenses and Counterclaims;
- c. Grant the relief requested by ADAPTIX in its Complaint; and

- d. Grant ADAPTIX such further relief as this Court may deem just and proper.

December 29, 2014

/s/ Paul J. Hayes

Paul J. Hayes

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**ATTORNEYS FOR ADAPTIX, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with the Local Rule CV-5 on December 29, 2014. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Paul J. Hayes

Paul J. Hayes